

# Exhibit 7

Deposition of Glen R. Blue / March 17, 2011

Page 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-oo-

---

In re: Methyl Tertiary Butyl  
Ether ("MTBE") Products  
Liability Litigation

---

Master File No.  
1:00-1898

This Document Relates To:

City of Fresno Case No.  
v. Chevron U.S.A. Inc., et al., MDL 1358 (SAS)  
Case No. 04 Civ. 4973

---

DEPOSITION OF GLEN R. BLUE  
March 17, 2011 at 1:00 (1:17) p.m.  
Before: ERIC L. JOHNSON  
RPR, CSR #9771

Taken at:  
Fresno, California

Deposition of Glen R. Blue / March 17, 2011

Page 19

1 A. Pardon?

2 Q. We will try to use Exhibit 2 as we go through  
3 questions.

4 A. Okay.

5 Q. How long were you associated with the station  
6 at 2809 South Chestnut?

7 MS. KLEAVER: Vague.

8 THE WITNESS: I don't know the exact dates.  
9 Several years. I owned the station.

10 MR. STEEVES: Q. You owned --

11 A. 280 -- well, 49 -- forget 2809. I have no  
12 interest in it.

13 MR. STEEVES: Excuse me. You what?

14 A. I was thinking -- it is 4090 South Chestnut.

15 Q. Right. I'd like to -- I'd like to first talk  
16 about 2809 South Chestnut.

17 A. All right.

18 Q. Do you recall when you started working at Red  
19 Triangle Oil Company in 2809?

20 A. What year?

21 Q. Yes.

22 A. At this location?

23 Q. Yes.

24 A. In the early '60s.

25 Q. What was your job title when you first started

Deposition of Glen R. Blue / March 17, 2011

Page 20

1 working there?

2 A. I was a janitor, sales, warehouseman, whatever  
3 had to be done. We didn't wear hats back in those days.

4 Q. And how long did you work there?

5 A. Well, I have to calculate. You told me a  
6 little while ago; 30-plus years?

7 Q. So you worked there during the time period you  
8 were associated with your father-in-law's business?

9 A. Yes.

10 Q. So that would have been, I think you testified,  
11 through 1989?

12 A. Yes.

13 Q. Did your job duties ever change over time?  
14 Were you just a jack-of-all-trades, or did you have a  
15 specific title at any point?

16 A. I worked there and did what had to be done.

17 Q. Do you recall who the operator of that station  
18 was at the time you were working there?

19 A. That was a company-operated store -- or  
20 station. Red Triangle operated it.

21 Q. Okay. Do you recall who owned the property,  
22 the actual dirt that the -- the station was on?

23 A. Arnold Hohenshelt.

24 Q. Did Arnold own the tanks as well, the --

25 A. He owned the complete facility.

Deposition of Glen R. Blue / March 17, 2011

Page 22

1 period you worked there?

2 A. Run that by me again.

3 MS. KLEAVER: Same objection.

4 MR. STEEVES: Q. Do you recall if Red Oil  
5 (sic) had an agreement to buy a certain brand of  
6 gasoline during the time period you worked there?

7 MS. KLEAVER: Same objection.

8 THE WITNESS: I can't tell you who had the  
9 contracts, but no doubt they did. They committed to buy  
10 a certain amount of gas.

11 MR. STEEVES: Q. But you can't recall the --  
12 the company?

13 MR. PARSEGHIAN: Objection; asked and answered.

14 THE WITNESS: The company bought from various  
15 people over a period -- I don't know what time frame you  
16 are looking at.

17 MR. STEEVES: Q. Let's start with the time  
18 period in the 1980s.

19 A. The biggest supplier is Exxon. That was the  
20 brand. Then they had various rebrand gas.

21 Q. You said that was the biggest supplier. Were  
22 there other suppliers?

23 A. Did the company buy from other people or people  
24 delivered in?

25 Q. Did the company buy from other people?

Deposition of Glen R. Blue / March 17, 2011

Page 23

1 A. Yes.

2 Q. Do you recall who that was?

3 A. Well, we bought from Jack Griggs Oil.

4 Q. Sorry, Jack Riggs?

5 A. Griggs, G-r-i-g-g-s.

6 Q. Griggs. And do you recall the approximate time  
7 period that the company was buying from --

8 A. I don't remember. I know we had Jim Harness.

9 John Harness Oil Company was a supplier of Exxon  
10 products. And we -- we bought from -- I can't recall  
11 everyone we bought from. Whoever had the lowest price  
12 we went and bought from, called rebrand.

13 Q. Are you aware of anyone else associated with  
14 the station that would have personal knowledge of these  
15 supply agreements?

16 MS. KLEAVER: Vague as to time.

17 THE WITNESS: I don't know who they would be.

18 MR. STEEVES: I am going to show you a few more  
19 documents associated with this site at 2809. Then we  
20 will move on to the next site.

21 (Deposition Exhibit 4 marked for  
22 identification)

23 MR. STEEVES: Q. Handing you what's been  
24 marked as Exhibit 4. It is a Business Plan Registration  
25 form for Red Triangle Oil Company dated January 31st,